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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLUERIBBON COALITION, INC., *et al.*,
and STATE OF UTAH, *et al.*,

Plaintiffs,

v.

U.S. BUREAU OF LAND MANAGEMENT,
et al.,

Defendants,

and

SOUTHERN UTAH WILDERNESS
ALLIANCE,

Defendant-Intervenor.

Case Nos. 2:23-cv-00923-DAK (lead)
4:24-cv-00046-DAK

**DEFENDANTS' STATEMENT OF
POSITION IN RESPONSE TO
AMENDED COMPLAINT DENYING
ARBITRARY AND CAPRICIOUS
AGENCY ACTION**

District Judge Dale A. Kimball
Magistrate Judge Jared C. Bennett

In accordance with DUCivR 7-4(b)(2)(B), Defendants Deb Haaland, et al., hereby
respond to the State of Utah Plaintiffs' First Amended Complaint, ECF No. 70. Therein,

Plaintiffs challenge Defendant Bureau of Land Management's September 2023 decision adopting the Labyrinth/Gemini Bridges Travel Management Plan. Defendants deny that the aforementioned decision, or any part of it, is arbitrary and capricious, not supported by substantial evidence, or otherwise contrary to law. Consequently, Defendants deny that Plaintiffs have stated a claim for relief or that Plaintiffs are entitled to any relief whatsoever.

Defendants present the following affirmative defenses:

1. Plaintiffs fail to state a claim upon which relief may be granted.
2. Plaintiffs lack standing to bring some or all of their claims.
3. Plaintiffs have failed to properly establish subject matter jurisdiction.
4. Plaintiffs have failed to demonstrate that some or all of their claims are ripe for judicial review.

Respectfully submitted this 6th day of September 2024.

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